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15 UNITED STATES DISTRICT COURT  
16 NORTHERN DISTRICT OF CALIFORNIA

17  
18 REGGIE CRANE, ) Case No.: 3:17-cv-01433-WHO  
19 Plaintiff, ) STIPULATION FOR AN EXTENSION OF  
20 vs. ) TIME OF 45 DAYS FOR DEFENDANT'S  
21 NANCY A. BERRYHILL, ) RESPONSE TO PLAINTIFF'S MOTION  
22 Acting Commissioner of Social Security, ) FOR SUMMARY JUDGMENT  
23 Defendant. )  
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25 IT IS HEREBY STIPULATED, by and between the parties, through their respective  
26 counsel of record, that Defendant shall have an extension of time of an additional 45 days to  
27 respond to Plaintiff's motion for summary judgment. This is the first continuance sought by  
28 Defendant. The current due date is October 13, 2017. The new due date will be November 27,  
2017.

29 There is good cause for this request. Since the filing of Plaintiff's motion for summary  
30 judgment, Defendant's counsel has been diligently addressing her full workload including  
31 several district court cases and one Equal Employment Opportunity Commission matter  
32 involving discovery, depositions, and travel. In addition, in October, Defendant's counsel was

1 assigned additional unanticipated matters that involved hearing and witness preparation. Despite  
2 counsel's diligence in responding to the new matters and her remaining workload, counsel was  
3 set back in addressing a number of her cases, including this one and other cases that have been  
4 extended. Furthermore, Defendant's counsel will be traveling for work, attending two hearings,  
5 and conducting additional depositions in the remainder of October and November.

6 Therefore, Defendant is respectfully requesting additional time up to and including  
7 November 27, 2017, to fully review the record and research the issues presented by Plaintiff's  
8 motion for summary judgment in this case. This request is made in good faith with no intention  
9 to unduly delay the proceedings.

10 The parties further stipulate that the Court's Scheduling Order shall be modified  
11 accordingly.

12 Respectfully submitted,

13 Date: October 12, 2017

TONY ARJO, ATTORNEY AT LAW

14 *s/ Tony Arjo by C.Chen\**

15 (As authorized by phone on 10/12/2017)

16 TONY ARJO  
Attorney for Plaintiff

17 Date: October 12, 2017

BRIAN J. STRETCH  
United States Attorney

18 By *s/ Carolyn B. Chen*  
CAROLYN B. CHEN  
Special Assistant U. S. Attorney

22 Attorneys for Defendant

24 ORDER

25 APPROVED AND SO ORDERED:

26 DATED: October 13, 2017

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HON. WILLIAM H. ORRICK  
UNITED STATES DISTRICT JUDGE